

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION

UNITED STATES OF AMERICA	)	CRIM. NO. <u>3:19-313</u>
	)	18 U.S.C. § 471
	)	18 U.S.C. § 472
	)	18 U.S.C. § 492
	)	18 U.S.C. § 982(a)(2)(B)
v.	)	28 U.S.C. § 2461(c)
	)	
<b>LEDON PIERRE REESE</b>	)	INDICTMENT

COUNT 1

THE GRAND JURY CHARGES:

That between on or about July 1, 2018, and December 20, 2018, in the District of South Carolina, the Defendant, **LEDON PIERRE REESE**, with intent to defraud, did falsely make, forge, and counterfeit obligations and other securities of the United States, that is, Federal Reserve Notes;

In violation of Title 18, United States Code, Section 471.

COUNT 2

THE GRAND JURY FURTHER CHARGES:

That on or about September 28, 2018, in the District of South Carolina, the Defendant, **LEDON PIERRE REESE**, with intent to defraud, did pass, utter, publish, and sell, and did attempt to pass, utter, publish, and sell, and did keep in his possession and did conceal falsely made, forged, counterfeited, and altered obligations and other securities of the United States;

In violation of Title 18, United States Code, Section 472.

## **FORFEITURE**

### **COUNTERFEITING:**

Upon conviction for violation of Title 18, United States Code, Sections 471 and 472 as charged in this Indictment, the Defendant, **LEDON PIERRE REESE**, shall forfeit to the United States any property, real or personal, constituting, derived from or traceable to proceeds the Defendant obtained directly or indirectly as a result of such offenses and all counterfeits of any coins or obligations or other securities of the United States or of any foreign government; any articles, devices, and other things made, possessed, or used in violation of such offenses; and any material or apparatus used or fitted, or intended to be used, in the making of such counterfeits, articles, devices, or things, found in the possession of the Defendants without property authority.

### **PROPERTY:**

Pursuant to Title 18 United States Code, Sections 492 and 982 (a)(2)(B), and Title 28 United States Code, Section 2461(c), the property which is subject to forfeiture upon conviction of the Defendant for the offenses charged in this Indictment includes, but is not limited to, the following:

#### **Proceeds/Forfeiture Judgment:**

A sum of money equal to all property the Defendant obtained as a result of the offenses charged in the Indictment, and all interest and proceeds traceable thereto as a result for his violation of 18 U.S.C. §§ 471 and 472.

SUBSTITUTE ASSETS:

If any of the property described above as being subject to forfeiture, as a result of any act or omission of the Defendant –

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by 18 U.S.C. § 982(b)(1), to seek forfeiture of any other property of the said Defendant up to the value of the above described forfeitable property;

Pursuant to Title 18, United States Code, Sections 492 and 982(a)(2)(B), and Title 28, United States Code, Section 2461(c).

A

*True*

BILL

FOREPERSON

*Sherril A. Lydon*  
SHERRI A. LYDON (WDHjr)  
UNITED STATES ATTORNEY